

DECLARATION OF ANNA WEISER

I, Anna Weiser, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called on to testify I could and would do so competently and truthfully to these matters.
2. I am an attorney and an Immigration Partner at Smith & Eulo. I have over two decades of practice experience in immigration law, and represent clients in all aspects of immigration law, including employment-based and investor visas, student visas, family-based adjustment of status, consular processing, deportation defense, asylum, and U.S. citizenship matters. I am an attorney in good standing.
3. I currently represent two clients who are currently detained at Alligator Alcatraz, including Hari Koneru and Gonzalo Almanza Valdez.
4. Mr. Koneru entered the United States on a student visa. He is currently a student at a local university. He was recently charged with selling vapes to a minor in Seminole County, Florida. When he was released on bond from criminal custody, he was taken into ICE custody on an immigration detainer, and transferred to the Alligator Alcatraz facility on 07/06/2025. Mr. Koneru is not subject to mandatory detention, entered the United States on a valid visa, and is eligible for release on bond from immigration detention.
5. On July 11, 2025, I went to Alligator Alcatraz to attempt to visit Mr. Koneru. I went to the facility via taxi, as I recently had surgery and am not supposed to drive, per doctor's orders. When I arrived at the facility, a member of the National Guard stopped me at a military checkpoint, and told me that I could not enter the facility. He told me that I could wait for hours and I wouldn't be able to see my client.
6. I emailed the ICE Office of Chief Counsel ("OCC") requesting that ICE file a Notice of Appearance ("NTA") for my client. An NTA is a document issued by the Department of Homeland Security ("DHS") to initiate formal removal proceedings against a noncitizen. It instructs the noncitizen to appear before an Immigration Judge and specifies the nature of removal proceedings, the legal authority for proceedings, factual allegations supporting removal, and the charges against the noncitizen. I also requested the OCC to release Mr. Koneru on bond. I did not receive a response.
7. I have emailed Southfacility@em.myflorida.com, Miami.Outreach@ice.dhs.gov, miami.dutyatty@ice.dhs.gov, jacksonville.outreach@ice.dhs.gov requesting the following: 1) immediate access to my client; 2) that ICE release my client from detention; 3) DHS file Notice to Appear (NTA) so bond can be requested in Immigration Court having jurisdiction; 4) my client is transferred to Krome North SPC or to Baker County ICE Detention Facility which provide attorneys with visitation rights and immigration court has jurisdiction over these facilities. I have enclosed a completed Attorney

Visitation Request Form for South Detention Facility (Alligator Alcatraz), Form G-28, Notice of Entry of Appearance as Attorney before DHS/ICE, Form EOIR 28, Notice of Entry of Appearance by Attorney before Immigration Court, and copy of Bond Motion and Exhibits filed with Krome Immigration Court on behalf of client.

8. To date, no meaningful response has been received. The only way I can speak with my client is via a non-confidential, monitored phone line when my client calls me from the facility.
9. I called the Immigration Court located at 18201 SW 12th St. Building 1, Suite C, Miami, Florida, at the Krome Immigration Detention Center ("Krome Immigration Court") to ask if I could file a motion on behalf of Mr. Koneru, who was detained at Alligator Alcatraz. The clerk stated that the Krome Immigration Court had jurisdiction over detainees held at Alligator Alcatraz. On 07/17/2025 I filed a pre-NTA motion for custody redetermination (commonly known as a motion for a bond hearing) to request a hearing before an Immigration Judge to order that DHS file an NTA on behalf of my client, and release him on bond.
10. On 07/17/2025, I received a Notice of Custody Redetermination Hearing in Immigration Proceedings from the Krome Immigration Court, stating that Mr. Koneru had a bond hearing scheduled on July 23, 2025 at 1:00 p.m. A true and correct copy of this Notice is attached as Exhibit A.
11. I also represent Mr. Almanza Valdez, who is a legal permanent resident from Cuba. He came to the United States at the age of six. He has a U.S. citizen son with his common-law wife, who is also a U.S. citizen, and before his detention, worked as a training manager at a local steakhouse restaurant.
12. Mr. Almanza Valdez was detained at a monthly check-in with his probation officer in Orlando, Florida, on July 11, 2025. He is required to check in monthly with a probation officer based on a plea deal for a racketeering charge, for which he received a sentence of probation, restitution, and no time served. His usual check-in appointment usually occurs on the first of the month, but his probation officer requested that he come in on July 11 instead. He was held in a holding room at the probation office, then placed on a bus, where he arrived at the detention facility known as Alligator Alcatraz on July 12. Mr. Almanza Valdez is not subject to mandatory detention, entered the United States on a valid visa, and is eligible for release on bond from immigration detention.
13. I also emailed the ICE OOC requesting that ICE file an NTA for Mr. Almanza Valdez. I also requested the OCC to release him on bond. I did not receive a response.
14. Because I had been told that the Krome Immigration Court had jurisdiction over detainees held at Alligator Alcatraz, I filed a pre-NTA motion to request a hearing before

an Immigration Judge to order DHS to file an NTA on behalf of Mr. Almanza Valdez, and release him on bond.

15. On 07/17/25, I received a Notice of Custody Redetermination Hearing in Immigration Proceedings from the Krome Immigration Court, stating that Mr. Almanza Valdez had a bond hearing scheduled on July 23, 2025 at 1:00 p.m. A true and correct copy of this Notice is attached as Exhibit B.
16. On July 23, 2025, I virtually appeared at Krome Immigration Court to represent Mr. Konaru and Mr. Almanza Valdez at their hearings. Mr. Almanza's common law wife and sister appeared in person and had driven five hours to attend the hearing. However, when I called the court, the clerk at the court told me that the court no longer had jurisdiction over cases of detainees held at Allegator Alcatraz, and that the hearings had been taken off the docket. I asked the clerk which court had jurisdiction over cases of detainees held at Allegator Alcatraz. The clerk told me that she had no further information, and that I would need to ask DHS. Neither Mr. Konaru nor Mr. Almanza Valdez were present at the Krome Immigration Court for the canceled hearings.
17. On 07/23/25 I again sent emails to DHS officers at the Krome Detention Center, Baker County Detention Center, the Duty Deportation Officer, the Office of Chief Counsel for the ICE Miami Field Office, and the Duty Attorney. I attached all motions for my clients, EOIR 28 Forms and G-28 Forms for both clients (Entry of Appearance), asking again for DHS to either release my clients, provide attorney access, file NTA or move my clients to a detention facility where I could have attorney access, and schedule a hearing for my clients before an Immigration Judge. On 07/23/25 I received a prompt response from the ICE Office of Chief Counsel in Miami, which instructed me to email the Alligator Alcatraz facility directly, at Southfacility@em.myflorida.com. On 07/23/25 I received another email from Anna E. Galeano, Assistant Chief Counsel, Office of the Principal Legal Advisor, Miami telling me to contact Enforcement and Removal Operations. No further information was provided.
18. I have emailed the Allegator Alcatraz facility at Southfacility@em.myflorida.com on 07/23/25 forwarding my previous emails and documents, and asking to access my clients, release the clients, transfer clients – anything so we can file for bond in immigration court having jurisdiction. No response has been received to date from South Detention Facility (Allegator Alcatraz). I remain unclear as to what the legal basis of my clients' detention, and which Immigration Court has jurisdiction over my clients' claims for release from custody.

Executed this 23 day of July, 2025, at Orlando, Florida



Anna Weiser

EXHIBIT A

IMMIGRATION COURT
18201 SW 12TH ST, BLDG 1 STE C
MIAMI, FL 33194

Weiser Law Firm PA
Weiser, Anna
PO Box 520155
Longwood, FL 32752

FILE: A221-464-760

RE: KONERU, HARI NAGU

NOTICE OF CUSTODY REDETERMINATION HEARING IN IMMIGRATION PROCEEDINGS

PLEASE TAKE NOTE THAT THE ABOVE CAPTIONED CASE HAS BEEN
SCHEDULED/RESCHEDULED FOR A CUSTODY REDETERMINATION HEARING BEFORE THE
IMMIGRATION COURT ON Jul 23, 2025 AT 1:00 P.M. AT THE FOLLOWING ADDRESS:

18201 SW 12TH ST, BLDG 1 STE C
MIAMI, FL 33194

YOU MAY BE REPRESENTED IN THIS PROCEEDING, AT NO EXPENSE TO THE GOVERNMENT, BY
AN ATTORNEY OR OTHER INDIVIDUAL AUTHORIZED AND QUALIFIED TO REPRESENT PERSONS
BEFORE AN IMMIGRATION COURT. IF YOU WISH TO BE REPRESENTED, YOUR ATTORNEY
OR REPRESENTATIVE SHOULD APPEAR WITH YOU AT THIS HEARING.

CERTIFICATION OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL [M] PERSONAL SERVICE [P] ELECTRONIC SERVICE [E]
TO: [] ALIEN [] ALIEN c/o Custodial Officer [E] ALIEN's ATT/REP [E] DHS
DATE: 07/17/2025 BY: COURT STAFF LVM
Attachments: [] EOIR-33 [] EOIR-28 [] Legal Services List [] Other

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EXHIBIT B

IMMIGRATION COURT
18201 SW 12TH ST, BLDG 1 STE C
MIAMI, FL 33194

Weiser Law Firm PA
Weiser, Anna
PO Box 520155
Longwood, FL 32752

FILE: A077-677-131

RE: ALMANZA, GONZALO

NOTICE OF CUSTODY REDETERMINATION HEARING IN IMMIGRATION PROCEEDINGS

PLEASE TAKE NOTE THAT THE ABOVE CAPTIONED CASE HAS BEEN
SCHEDULED/RESCHEDULED FOR A CUSTODY REDETERMINATION HEARING BEFORE THE
IMMIGRATION COURT ON Jul 23, 2025 AT 1:00 P.M. AT THE FOLLOWING ADDRESS:

18201 SW 12TH ST, BLDG 1 STE C
MIAMI, FL 33194

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BEFORE AN IMMIGRATION COURT. IF YOU WISH TO BE REPRESENTED, YOUR ATTORNEY
OR REPRESENTATIVE SHOULD APPEAR WITH YOU AT THIS HEARING.

CERTIFICATION OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL ☐ PERSONAL SERVICE ☐ ELECTRONIC SERVICE ☐
TO: ☐ ALIEN ☐ ALIEN c/o Custodial Officer ☐ ALIEN's ATT/REP ☐ DHS
DATE: __07/17/2025__ BY: COURT STAFF __LVM__
Attachments: ☐ EOIR-33 ☐ EOIR-28 ☐ Legal Services List ☐ Other

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